



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 21, 2022

**VIA ECF**

The Honorable Laura T. Swain  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: *United States v. Liu et al.*, 21 Cr. 592 (LTS)

Dear Chief Judge Swain:

The Government writes on behalf of the parties to respectfully request an approximately 90-day adjournment of the conferences in this case currently scheduled for Friday, January 28, 2022. The adjournment will allow additional time for continued production and defense review of the substantial discovery in this case. It will also allow additional time for the parties to engage in discussions concerning potential pretrial resolutions. This is the first request for an adjournment of this conference.

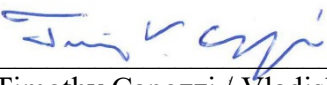
If the Court grants this request, the Government further requests that the Court exclude time under the Speedy Trial Act between January 28, 2022, and the new conference date set by the Court. The ends of justice served by granting such an exclusion outweigh the best interest of the public and the defendants in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). An exclusion is warranted to allow additional time for the defendants to review discovery and for the parties to engage in discussions of potential pretrial resolutions of this case. The defendants consent to this request.

The pretrial conferences scheduled for January 28, 2022, are adjourned to occur as a single pretrial conference on April 22, 2022, at 10:00 a.m. The Court finds pursuant to 18 U.S.C. § 3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through to April 22, 2022, outweigh the best interests of the public and the defendants in a speedy trial for the reasons stated above. DE#89 resolved.

SO ORDERED.  
Dated: January 25, 2022  
/s/ Laura Taylor Swain, Chief U.S.D.J.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:   
Timothy Capozzi / Vladislav Vainberg  
Assistant United States Attorneys  
(212) 637-2404 / 1029

cc: Defense counsel listed on ECF